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April 29, 2015

Via Certified Mail – Return Receipt Requested
Attorney General Loretta E. Lynch
U.S. Department of Justice
950 Pennsylvania Ave., N.W.
Washington, D.C. 20530-0001

Via Certified Mail – Return Receipt Requested
Attorney General – Citizen Suit Coordinator
Environmental and Natural Resources Division
Law and Policy Section
P.O. Box 7415
Ben Franklin Station
Washington, D.C. 20044-7415

Via Certified Mail – Return Receipt Requested
Administer Gina McCarthy
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N.W.
Mail Code 1101A
Washington, D.C. 20460

Via Certified Mail – Return Receipt Requested
Regional Administrator Dennis McLerran
U.S. Environmental Protection Agency, Region 10
1200 Sixth Ave., Suite 900
Seattle WA 98101

Re: *Columbia Riverkeeper v. Western Fabrication Center, LLC*; W.D. Wash. No. 3:15-CV-05271-RBL

Dear Honorable Civil Servants,

Enclosed is a copy of the complaint filed yesterday in the Western District of Washington in the above-named Clean Water Act citizen suit. This notice is provided to you pursuant to 40 C.F.R. § 135.4.

Sincerely,

SMITH & LOWNEY, P.L.L.C.

By: 
Brian A. Knutsen

Brian A. Knutsen
Meredith Crafton
SMITH & LOWNEY, PLLC
2317 East John Street
Seattle, Washington 98112
(206) 860-2883

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

COLUMBIA RIVERKEEPER, Plaintiff, v. WESTERN FABRICATION CENTER, LLC, Defendant.	COMPLAINT

I. INTRODUCTION

1. This action is a citizen suit brought under Section 505 of the Clean Water Act ("CWA") as amended, 33 U.S.C. § 1365. Plaintiff, Columbia Riverkeeper, seeks a declaratory judgment, injunctive relief, the imposition of civil penalties, and the award of costs, including attorneys' and expert witness fees, for defendant Western Fabrication Center, LLC's ("Defendant") repeated and ongoing violations of Sections 301(a) and 402 of the CWA, 33 U.S.C. §§ 1311(a) and 1342, and the terms and conditions of the National Pollutant Discharge

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Elimination System ("NPDES") permits authorizing discharges of pollutants from Defendant's facility to navigable waters.

II. JURISDICTION AND VENUE

2. The Court has subject matter jurisdiction under Section 505(a) of the CWA, 33 U.S.C. § 1365(a). The relief requested herein is authorized by 33 U.S.C. §§ 1319(d) and 1365(a).

3. In accordance with Section 505(b)(1)(A) of the CWA, 33 U.S.C. § 1365(b)(1)(A), Columbia Riverkeeper notified Defendant of Defendant's violations of the CWA and of Columbia Riverkeeper's intent to sue under the CWA by letter dated and postmarked February 9, 2015 ("Notice Letter"). A copy of the Notice Letter is attached to this complaint as Exhibit 1. The allegations in the Notice Letter are incorporated herein by this reference. In accordance with 33 U.S.C. § 1365(b)(1)(A) and 40 C.F.R. § 135.2(a)(1), Columbia Riverkeeper provided copies of the Notice Letter to Defendant's Registered Agent, the Administrator of the United States Environmental Protection Agency ("USEPA"), the Administrator of USEPA Region 10, and the Director of the Washington Department of Ecology ("WDOE") by mailing copies to these individuals on February 9, 2015.

4. At the time of the filing of this Complaint, more than sixty (60) days have passed since the Notice Letter and copies thereof were issued in the manner described in the preceding paragraph.

5. The violations complained of in the Notice Letter are continuing or are reasonably likely to re-occur. Defendant is in violation of its NPDES permit and the CWA.

6. At the time of the filing of this Complaint, neither the USEPA nor the WDOE has commenced any action constituting diligent prosecution to redress these violations.

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7. The source of the violations complained of is located in Cowlitz County, Washington, within the Western District of Washington, and venue is therefore appropriate in the Western District of Washington under Section 505(c)(1) of the CWA, 33 U.S.C. § 1365(c)(1).

III. PARTIES

8. Plaintiff Columbia Riverkeeper is suing on behalf of itself and its members. Columbia Riverkeeper is a 501(c)(3) non-profit corporation registered in the State of Washington. The mission of Columbia Riverkeeper is to restore and protect the water quality of the Columbia River and all life connected to it, from the headwaters to the Pacific Ocean. To achieve these objectives, Columbia Riverkeeper implements scientific, educational, and legal programs aimed at protecting water quality, air quality, and habitat in the Columbia River Basin. This lawsuit is part of Columbia Riverkeeper's effort to improve water quality in the Columbia River for purposes including swimming, habitat quality, and subsistence, recreational, and commercial fishing.

9. Columbia Riverkeeper has representational standing to bring this action. Columbia Riverkeeper has over 8,000 members and supporters, many of which reside in the vicinity of waters affected by the Defendant's discharges of pollutants. Members of Columbia Riverkeeper use and enjoy the waters and the surrounding areas that are adversely affected by the Defendant's discharges. Columbia Riverkeeper's members use these areas for, inter alia, fishing, hiking, walking, photographing, boating, and observing wildlife. Defendant has consistently violated the conditions of its NPDES permits and exceeded the permits' benchmark pollutant discharge levels. Columbia Riverkeeper has serious concerns about the impacts of Defendant's operations and industrial stormwater discharges on the Columbia River and its

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tributaries, including the Coweeman and Cowlitz Rivers. Defendant's operations and stormwater discharges degrade these rivers' water quality and place the health and well-being of all who use the Columbia River and these tributaries at risk. The environmental, health, aesthetic, and recreational interests of Columbia Riverkeeper's members have been, are being, and will be adversely affected by the Defendant's CWA and NPDES permit violations addressed herein and by the members' reasonable concerns related to the effects of the violations and pollutant discharges. These injuries are fairly traceable to the violations and redressable by the Court.

10. Columbia Riverkeeper has organizational standing to bring this action. Columbia Riverkeeper has been actively engaged in a variety of educational and advocacy efforts to improve water quality and to address sources of water quality degradation in the Columbia River and its tributaries. Defendant has failed to fulfill the monitoring, recordkeeping, reporting, and planning requirements, among others, necessary for compliance with its NPDES permits and the CWA. As a result, Columbia Riverkeeper is deprived of information that supports its ability to serve its members by disseminating information and taking appropriate action, and Columbia Riverkeeper's efforts to educate and advocate for greater environmental protection for the benefit of its members is thereby obstructed. Thus, Columbia Riverkeeper's organizational interests have been adversely affected by Defendant's violations. These injuries are fairly traceable to Defendant's violations and redressable by the Court.

11. Defendant is a corporation authorized to conduct business under the laws of the State of Washington.

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12. Defendant owns and operates a metal fabrication facility at or about 2203 Talley Way, Kelso, Washington 98626, and contiguous and/or adjacent properties (referred to herein as the "facility").

IV. LEGAL BACKGROUND

13. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person, unless in compliance with the provisions of the CWA. Section 301(a) prohibits, inter alia, such discharges not authorized by, or in violation of, the terms of a NPDES permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

14. The State of Washington has established a federally approved state NPDES program administered by the WDOE. Wash. Rev. Code § 90.48.260; Wash. Admin. Code ch. 173-220. This program was approved by the Administrator of the USEPA pursuant to 33 U.S.C. § 1342(b).

15. The WDOE has repeatedly issued the Industrial Stormwater General Permit ("Permit") under Section 402(a) of the CWA, 33 U.S.C. § 1342(a), most recently on October 21, 2009, effective January 1, 2010, modified May 16, 2012 (the "2010 Permit"), and on December 3, 2014, effective January 2, 2015 (the "2015 Permit"). The 2010 Permit and the 2015 Permit (collectively, "the Permits") contain substantially similar requirements and authorize those that obtain coverage thereunder to discharge stormwater associated with industrial activity, a pollutant under the CWA, and other pollutants contained in the stormwater to the waters of the State subject to certain terms and conditions.

16. The Permits impose certain terms and conditions on those covered thereby, including monitoring and sampling of discharges, reporting and recordkeeping requirements, as well as restrictions on the quality of stormwater discharges. To reduce and eliminate pollutant

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concentrations in stormwater discharges, the Permits require, among other things, that permittees develop and implement best management practices ("BMPs") and a Stormwater Pollution Prevention Plan ("SWPPP"), and apply all known and reasonable methods of prevention, control, and treatment ("AKART") to discharges. The specific terms and conditions of the Permits are described in detail in the Notice Letter. See Exhibit 1.

V. FACTS

17. Defendant filed with the WDOE applications for coverage under the Permits. WDOE granted Defendant coverage under the Permits for Defendant's facility under Permit Number WAR-011442. WDOE previously granted Defendant coverage under the previous iteration of the Permit under Permit Number SO3-011442.

18. Defendant's facility discharges stormwater associated with industrial activity and other pollutants via the City of Kelso stormwater conveyances and/or other stormwater conveyances to the Coweeman River, which discharges to the Cowlitz River, which discharges to the Columbia River.

19. Defendant has violated the Permits and Sections 301(a) and 402 of the CWA, 33 U.S.C. §§ 1311(a) and 1342, by discharging pollutants not in compliance with an NPDES Permit. Defendant's violations of the Permits and the CWA are set forth in sections II through VII of the Notice Letter attached hereto as Exhibit 1 and are incorporated herein by this reference. In particular and among the other violations described in the Notice Letter, Defendant has violated the Permits by failing to monitor discharges, implement BMPs to control stormwater quality, to timely complete adaptive management responses required by the Permits, and to timely submit complete and accurate reports.

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20. Defendant has discharged stormwater containing levels of pollutants that exceed the benchmark values established by the Permits, including on the days on which Defendant collected samples with the results identified in bold in Table 1 below:

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TABLE 1: DISCHARGE MONITORING REPORT DATA FOR WESTERN FABRICATION

Quarter in which sample collected	Turbidity (NTU) (Benchmark 25 NTU)	pH (su) (Benchmark 5-9 su)	Zinc (µg/L) Concentration (Benchmark 117 µg/L)	Copper (µg/L) (Benchmark 14 µg/L)	Lead (µg/L) (Benchmark 81.6 µg/L)	Total Petroleum Hydrocarbon (mg/L) (Benchmark 10 mg/L)	Oil Sheen Present (Yes/No) (Benchmark "No Visible Sheen")
1Q 2010	.81	**3.34**	**7770**	2.8	ND	NR	NR
2Q 2010	**27**	6.35	**215**	**35.6**	20	NR	NR
3Q 2010	DMR States "No Discharge"						
4Q 2010	18	6.64	**249**	11.6	ND	NR	No
1Q 2011	13.2 **60.2**	6.20 6.17	**235** 68.3	4 9.1	ND	NR	No No
2Q 2011							
3Q 2011	DMR States "No Discharge"						
4Q 2011	3.5	6.29	**130**	4	ND	ND	No
1Q 2012	7.3	6.35	**215**	11	20	0	No
2Q 2012	3.48	7.32	**140**	3.9	0	"N/A"	No
3Q 2012	DMR States "No Discharge"						
4Q 2012	NR	NR	**290**	NR	NR	NR	NR
1Q 2013							
2Q 2013	NR	NR	**367**	NR	NR	NR	NR
3Q 2013	20.4	**3.69**	**1460**	8.4	2.55	4.9	No
4Q 2013							
1Q 2014	**70.95 (81.6 & 60.3)**	9.10 / 7.25	**243.5 (256 & 231)**	**34 (38.6 & 29.4)**	14. 8 (17.4 & 12.2)	NR	No
2Q 2014	**39.7**	6.58	**135**	13.4	5.67	0	No
3Q2014	DMR States "No Discharge"						

Note a: Table 1 lists benchmark levels established in the 2010 Permit. Values in **bold** indicate benchmark exceedances. "NR" represents parameters for which data was not reported. "ND" represents where discharge monitoring reports noted parameter "Not Detected."

Note b: Quarters that include three values, two of which are contained within parenthesis, reflect quarters during which multiple samples were taken from a single outfall. The values contained within parenthesis are the sample results and the value outside of the parenthesis is the average of the sample results.

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The Permits require Defendant's monitoring to be representative of discharges from the facility. The stormwater monitoring data provided in Table 1 reflects the stormwater monitoring results that Defendant has submitted to the WDOE.

21. Defendant's exceedances of the benchmark values indicate that Defendant is failing to apply AKART to its discharges and/or is failing to implement an adequate SWPPP and BMPs. Upon information and belief, Defendant violated the Permits by not developing, modifying, and/or implementing BMPs and a SWPPP in accordance with the requirements of the Permits, by not applying AKART to discharges from the facility. These violations include those resulting from Defendant's expansion of its operations onto adjacent properties without modifying its SWPPP. These requirements and Defendant's violations thereof are described in detail in sections II and III of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.

22. Defendant has violated the monitoring requirements of the Permits. For example, Defendant failed to collect stormwater samples and/or submit discharge monitoring requirements for any of its discharge points during the third quarter of 2010, the second and third quarters of 2011, the third quarter of 2012, the first and fourth quarters of 2013, and the third quarter of 2014. Defendant has also violated the monitoring requirements of the Permits by failing to monitor discharges from each distinct point of discharge from the facility. Defendant has further failed to conduct the requisite visual monitoring and inspections, failed to prepare and maintain the requisite inspection reports or checklists, and failed to make the requisite certifications and summaries. The monitoring requirements and Defendant's violations thereof are described in section IV of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.

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23. Defendant has not conducted and/or completed the corrective action responses as required by the Permits. These requirements of the Permits and Defendant's violations thereof are described in section V of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.

24. Condition S8.B of the Permits require a permittee to undertake a Level 1 corrective action whenever it exceeds a benchmark value identified in Condition S5. A Level 1 corrective action comprises review of the SWPPP to ensure permit compliance, revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges, signature and certification of the revised SWPPP, summary of the Level 1 corrective action in the annual report, and full implementation of the revised SWPPP as soon as possible, but no later than the DMR due date for the quarter the benchmark was exceeded. Condition S8.A of the 2015 Permit requires that Defendant implement any Level 1 corrective action required by the 2010 Permit.

25. Defendant triggered Level 1 corrective action requirements for each benchmark exceedance identified in Table 1 above. Defendant has violated the requirements of the Permits described above by failing to conduct a Level 1 corrective action in accordance with Permit conditions, including the required review, revision, and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report, each time during the last five (5) years and sixty (60) days, that its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH, including the benchmark excursions listed in Table 1 above. These corrective action requirements and Defendant's violations thereof are described in section V.A of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.

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26. Condition S8.C of the Permits require a permittee to undertake a Level 2 corrective action whenever it exceeds a benchmark value for any two quarters during a calendar year. A Level 2 corrective action comprises review of the SWPPP to ensure permit compliance, revision of the SWPPP to include additional structural source control BMPs with the goal of achieving the benchmark in future discharges, signature and certification of the revised SWPPP in accordance with Condition S3 of the Permits, summary of the Level 2 corrective action (planned or taken) in the annual report, and full implementation of the revised SWPPP by August 31st of the following year, including installation of necessary structural source control BMPs. Condition S8.A of the 2015 Permit requires that Defendant implement any Level 1 corrective action required by the 2010 Permit.

27. Defendant triggered multiple Level 2 corrective action requirements for multiple pollutant parameters as indicated by the benchmark exceedances in Table 1 above. Defendant violated the requirements of the Permits described above by failing to conduct a Level 2 corrective action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs to ensure that all points of discharge from the facility meet benchmarks, including additional structural source control BMPs, and the required summarization in the annual report each time Defendant's stormwater sampling results triggered the requirements of a Level 2 corrective action under the provisions of the Permits. These corrective action requirements and Defendant's violations thereof are described in section V.B of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.

28. Condition S8.D of the Permits requires a permittee to undertake a Level 3 corrective action whenever it exceeds a benchmark value for any three quarters during a calendar

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year. This is the most comprehensive adaptive management provision under the Permits. A Level 3 corrective action under the 2010 Permit comprises review of the SWPPP to ensure permit compliance, revisions to the SWPPP to include additional treatment BMPs with the goal of achieving benchmarks in future discharges and additional operational and/or structural source control BMPs if necessary for proper function and maintenance of treatment BMPs, signature and certification of the revised SWPPP, and a summary of the Level 3 corrective action in the annual report that describes how it was or will be determined whether existing treatment BMPs will be modified/enhanced or new/additional treatment BMPs will be installed. A licensed professional engineer, geologist, hydrogeologist, of certified professional in storm water quality must design and stamp the portion of the SWPPP that addresses stormwater treatment structures or processes. Before installing BMPs that require the site-specific design or sizing of structures, equipment, or processes to collect, convey, treat, reclaim, or dispose of industrial stormwater, the permittee must submit an engineering report, plans, and specifications, and an operations and maintenance manual to WDOE for review. The engineering report must be submitted no later than the May 15th prior to the Level 3 corrective action deadline. The plans and specifications and the operations and maintenance manual must be submitted to WDOE at least thirty (30) days before construction/installation. The revised SWPPP, including additional treatment BMPs, must be fully implemented as soon as possible and no later than September 30th of the year following that in which the Level 3 corrective action was triggered. Condition S8.A of the 2015 Permit requests that Defendant implement any Level 3 corrective action required by the 2010 Permit.

29. As indicated in Table 1 above, Defendant has triggered the Level 3 corrective action requirements of the Permits. Defendant has violated these requirements by failing to

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conduct a Level 3 corrective action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, including the requirement to have a specified professional design and stamp the portion of the SWPPP pertaining to treatment, the required implementation of additional BMPs, including additional treatment BMPs to ensure that all points of discharge from the facility meet benchmarks (not just the sampled point of discharge), the required submission of an engineering report, plans, specifications, and an operations and maintenance plan, and the required summarization in the annual report each time stormwater monitoring results for the facility have triggered the requirements of a Level 3 corrective action under the provisions of the Permits. These corrective action requirements and Defendant's violations thereof are described in section V.C of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.

30. Condition S9.B of the Permits requires Defendant to submit an accurate and complete annual report to WDOE no later than May 15th of each year that includes specific information. Defendant has violated these requirements. For example, Defendant violated this condition by failing to include all of the required information in the annual reports it submitted for years 2010, 2011, 2012, and 2013. These annual report requirements and Defendant's violations thereof are described in section VI of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.

31. Upon information and belief, Defendant has failed to comply with recording and record keeping requirements of the Permits. These requirements and Defendant's violations thereof are described in section VII of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.

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32. Discharges from Defendant's facility contribute to the polluted conditions of the waters of the State, including the Columbia River and its tributaries, including the Coweeman and Cowlitz Rivers. Discharges from Defendant's facility contribute to the ecological impacts that result from the polluted condition of these waters and to Columbia Riverkeeper's and its members' injuries resulting therefrom.

33. The vicinity of the facility's discharges are used by the citizens of Washington and visitors, as well as at least one of Columbia Riverkeeper's members, for recreational activities, including boating, biking, fishing and nature watching. Columbia Riverkeeper's members also derive aesthetic benefits from the receiving waters. Columbia Riverkeeper's and its members' enjoyment of these activities and waters is diminished by the polluted state of the receiving waters and by Defendant's contributions to such polluted state.

34. A significant penalty should be imposed against Defendant under the penalty factors set forth in 33 U.S.C. § 1319(d).

35. Defendant's violations were avoidable had Defendant been diligent in overseeing facility operations and maintenance.

36. Defendant benefited economically as a consequence of its violations and failure to implement improvements at the facility.

VI. CAUSE OF ACTION

37. The preceding paragraphs and the allegations in sections II through VII of the Notice Letter, attached hereto as Exhibit 1, are incorporated herein.

38. Defendant's violations of its NPDES permits described herein and in the Notice Letter constitute violations of sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and 1342,

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and violations of "effluent standard(s) or limitation(s)" as defined by section 505 of the CWA, 33 U.S.C. § 1365.

39. Upon information and belief, the violations committed by Defendant are ongoing or are reasonably likely to continue to occur. Any and all additional violations of the Permits and the CWA which occur after those described in Columbia Riverkeeper's Notice Letter but before a final decision in this action should be considered continuing violations subject to this Complaint.

40. Without the imposition of appropriate civil penalties and the issuance of an injunction, Defendant is likely to continue to violate the Permits and the CWA to the further injury of Columbia Riverkeeper, its members, and others.

41. A copy of this Complaint will be served upon the Attorney General of the United States and the Administrator of the USEPA as required by 33 U.S.C. § 1365(c)(3).

VII. RELIEF REQUESTED

Wherefore, Columbia Riverkeeper respectfully requests that this Court grant the following relief:

A. Issue a declaratory judgment that Defendant has violated and continues to be in violation of the Permits and Sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and 1342;

B. Enjoin Defendant from operating the facility in a manner that results in further violations of the Permits or the CWA;

C. Order Defendant to immediately implement a SWPPP that is in compliance with the Permits;

D. Order Defendant to allow Columbia Riverkeeper to participate in the development and implementation of Defendant's SWPPP;

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E. Order Defendant to provide Columbia Riverkeeper, for a period beginning on the date of the Court's Order and running for two (2) years after Defendant achieves compliance with all of the conditions of the Permits, with copies of all reports and other documents which Defendant submits to the USEPA or to the WDOE regarding Defendant's coverage under the Permit at the time those documents are submitted to these agencies;

F. Order Defendant to take specific actions to remediate the environmental harm caused by its violations;

G. Grant such other preliminary and/or permanent injunctive relief as Columbia Riverkeeper may from time to time request during the pendency of this case;

H. Order Defendant to pay civil penalties of $37,500.00 per day of violation for each violation committed by Defendant pursuant to Sections 309(d) and 505(a) of the CWA, 33 U.S.C. §§ 1319(d) and 1365(a), and 40 C.F.R. § 19;

I. Award Columbia Riverkeeper its litigation expenses, including reasonable attorneys' and expert witness fees, as authorized by Section 505(d) of the CWA, 33 U.S.C. § 1365(d); and

J. Award such other relief as this Court deems appropriate.

RESPECTFULLY SUBMITTED this 28th day of April, 2015.

SMITH & LOWNEY, PLLC

By: s/ Brian A. Knutsen

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Meredith Crafton, WSBA # 46558
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Attorneys for plaintiff Columbia Riverkeeper

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EXHIBIT 1

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February 9, 2015

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Managing Agent
Western Fabrication Center, L.L.C.
2203 Talley Way
Kelso, WA 98626

Via Certified Mail - Return Receipt Requested
Michael W. Frey, Registered Agent
600 Royal St., Suite B
Kelso, WA 98626

Re: **NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION PLAN**

Dear Managing Agent:

This letter is submitted on behalf of Columbia Riverkeeper, 111 Third Avenue, Hood River, OR 97031, (541) 387-3030. Any response or correspondence related to this matter should be directed to Smith & Lowney, PLLC at the letterhead address. This letter is to provide you with sixty days notice of Columbia Riverkeeper's intent to file a citizen suit against Western Fabrication Center, L.L.C. ("Western Fabrication") under section 505 of the Clean Water Act ("CWA"), 33 USC § 1365, for the violations described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by Western Fabrication's National Pollution Discharge Elimination System ("NPDES") permit.

Western Fabrication was granted coverage under the Washington Industrial Stormwater General Permit issued by the Washington Department of Ecology ("Ecology") on October 21, 2009, effective January 1, 2010, modified May 16, 2012, effective July 1, 2012, through January 1, 2015, under National Pollutant Discharge Elimination System Permit No. WAR-011442 (the "2010 Permit"). Western Fabrication was granted coverage under the current iteration of the Washington Industrial Stormwater General Permit issued by Ecology on December 3, 2014, effective January 2, 2015 and set to expire on December 31, 2019 (the "2015 Permit") and maintains the same permit number WAR-011442.

Western Fabrication has violated and continues to violate the terms and conditions of the 2010 Permit and the 2015 Permit (collectively, the "Permits") with respect to operations of, and discharges of stormwater and pollutants from, its facility located at or near 2203

Talley Way, Kelso, WA 98626 (the "facility"). The facility subject to this notice includes any contiguous or adjacent properties owned or operated by Western Fabrication.

I. COLUMBIA RIVERKEEPER'S COMMITMENT TO PROTECTING A FISHABLE AND SWIMABLE COLUMBIA RIVER.

Columbia Riverkeeper's mission is to restore and protect the water quality of the Columbia River and all life connected to it, from the headwaters to the Pacific Ocean. Columbia Riverkeeper is a non-profit organization with members who live, recreate, and work throughout the Columbia River basin, including near and downstream of Western Fabrication's facility.

Threats facing the Columbia River are severe by any measure. *See Columbia River Basin State of River Report for Toxics*, Environmental Protection Agency, Region 10 (January 2009), available online at: http://yosemite.epa.gov/r10/ecocomm.nsf/Columbia/SoRR/. In fact, the vast majority of rivers and streams in Washington fail to meet basic state water quality standards for pollutants such as toxics and temperature. *See* State of Washington 303(d) List, available online at: http://www.ecy.wa.gov/programs/wq/303d/ index.html. These standards are designed to protect designated uses, including aquatic life, fishing, swimming, and drinking water.

Stormwater runoff is "one of the great challenges of water pollution control" and "is a principal contributor to water quality impairment of waterbodies nationwide." *See Urban Stormwater Management in the United States*, National Research Council (Oct. 15, 2008), available online at: http://www.epa.gov/npdes/pubs/nrc_stormwaterreport.pdf. When rain sends runoff across city streets, construction projects, and industrial facilities, the water picks up contaminants that are drained into waterways such as the Columbia River and its tributaries. These toxics accumulate in local fish, wildlife, and birds. To address this leading cause of water quality impairment, Columbia Riverkeeper invests significant time and resources in reducing pollutant loads from industrial, municipal, and construction stormwater sources.

This notice of intent to sue Western Fabrication is part of Columbia Riverkeeper's effort to improve water quality in the Columbia River for purposes including swimming, habitat quality, and subsistence, recreational, and commercial fishing. Columbia Riverkeeper has serious concerns about the impacts of Western Fabrication's operations and industrial stormwater discharges reaching the Columbia River. As discussed below, Western Fabrication has consistently violated permit conditions and exceeded the 2010 Permit's benchmark pollutant discharge levels. Western Fabrication's operations and stormwater discharges degrade the Columbia River's water quality and place the health and well-being of all who use the Columbia at risk.

II. COMPLIANCE WITH STANDARDS.

A. Violations of Water Quality Standards.

Condition S10.A of the Permits prohibits discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington's efforts to protect clean water. In particular, water quality standards represent the U.S. Environmental Protection Agency ("EPA") and Ecology's determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington, Ecology designates the "beneficial uses" that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric water quality standards. WAC 173-201A-010; WAC 173-201A-510 ("No waste discharge permit can be issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter."). Narrative water quality standards provide legal mandates that supplement the numeric standards. Furthermore, narrative water quality standards apply with equal force, even when Ecology has established numeric water quality standards. Specifically, Condition S10.A of the Permits requires that Western Fabrication's discharges not cause or contribute to violations of Washington State's water quality standards.

Western Fabrication discharges to the Coweeman River via the Kelso stormwater system and/or other conveyances. The Coweeman River discharges to the Cowlitz River, which discharges to the Columbia River. Western Fabrication discharges stormwater that contains elevated levels of turbidity, zinc and copper as indicated in the table of benchmark exceedances below. Further, the data provided in the table below represent samples collected from only one of Western Fabrication's discharge points. Discharges of stormwater from the facility cause and/or contribute to violations of water quality standards for turbidity, zinc, and copper, and aesthetic criteria in the Coweeman River and have occurred each and every day during the last five years on which there was 0.1 inch or more of precipitation, and continue to occur. These water quality standards include those set forth in WAC 173-201A-240, and -260(2). Precipitation data from that time period are appended to this notice of intent to sue and identifies these days.

TABLE 1: DISCHARGE MONITORING REPORT DATA FOR WESTERN FABRICATION							
Quarter in which sample collected	Turbidity (NTU) (Benchmark 25 NTU)	pH (su) (Benchmark 5-9 su)	Zinc (µg/L) Concentration (Benchmark 117 µg/L)	Copper (µg/L) (Benchmark 14 µg/L)	Lead (µg/L) (Benchmark 81.6 µg/L)	Total Petroleum Hydrocarbon (mg/L) (Benchmark 10 mg/L)	Oil Sheen Present (Yes/No) (Benchmark "No Visible Sheen")
1Q 2010	.81	**3.34**	**7770**	2.8	ND	NR	NR
2Q 2010	**27**	6.35	**215**	**35.6**	20	NR	NR
3Q 2010	DMR States "No Discharge"						
4Q 2010	18	6.64	**249**	11.6	ND	NR	No
1Q 2011	13.2 **60.2**	6.20 6.17	**235** 68.3	4 9.1	ND	NR	No No
2Q 2011							
3Q 2011	DMR States "No Discharge"						
4Q 2011	3.5	6.29	**130**	4	ND	ND	No
1Q 2012	7.3	6.35	**215**	11	20	0	No
2Q 2012	3.48	7.32	**140**	3.9	0	"N/A"	No
3Q 2012	DMR States "No Discharge"						
4Q 2012	NR	NR	**290**	NR	NR	NR	NR
1Q 2013							
2Q 2013	NR	NR	**367**	NR	NR	NR	NR
3Q 2013	20.4	**3.69**	**1460**	8.4	2.55	4.9	No
4Q 2013							
1Q 2014	**70.95 (81.6 & 60.3)**	9.10 / 7.25	**243.5 (256 & 231)**	**34 (38.6 & 29.4)**	14. 8 (17.4 & 12.2)	NR	No
2Q 2014	**39.7**	6.58	**135**	13.4	5.67	0	No

Note a: Table 1 lists benchmark levels established in the 2010 Permit. Values in **bold** indicate benchmark exceedances. "NR" represents parameters for which data was not reported. "ND" represents where discharge monitoring reports noted parameter "Not Detected."
Note b: Quarters that include three values, two of which are contained within parenthesis, reflect quarters during which multiple samples were taken from a single outfall. The values contained within parenthesis are the sample results and the value outside of the parenthesis is the average of the sample results.

B. Compliance with Standards.

Condition S10.C of the Permits requires Western Fabrication to apply all known and reasonable methods of prevention, control and treatment ("AKART") to all discharges, including preparing and implementing an adequate SWPPP and best management practices ("BMPs"). Western Fabrication has violated and continues to violate these conditions by failing to apply AKART to its discharges by, among other things, failing to implement an

adequate SWPPP and BMPs as evidenced by the elevated levels of pollutants in its discharge indicated in the table above and as described below.

Condition S1.A of the Permits require that all discharges and activities be consistent with the terms and conditions of the permit. Western Fabrication has violated this condition by discharging and acting inconsistent with the conditions of the Permits as described in this Notice of Intent to Sue.

III. STORMWATER POLLUTION PREVENTION PLAN VIOLATIONS.

The SWPPP that Columbia Riverkeeper received in response to its request to Ecology for public records relating to Western Fabrication may not be Western Fabrication's current SWPPP. However, the extensive violations of the Permits documented in the publically available records, including the numerous violations of the SWPPP requirements described in an inspection report, indicate that Western Fabrication is not fully implementing a SWPPP that includes adequate BMPs and that otherwise includes all of the required SWPPP components. Columbia Riverkeeper therefore provides notice, based upon information and belief, that Western Fabrication has not developed and implemented a SWPPP that complies with the requirements of the Permits as described below.

Condition S3.A.1 of the Permits requires Western Fabrication to develop and implement a SWPPP as specified in these permits. Condition S3.A.2 of the Permits requires the SWPPP to specify BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. On information and belief, Western Fabrication has violated these requirements of the Permits each and every day during the last five years, and continues to violate them as it has failed to prepare and/or implement a SWPPP that includes AKART BMPs and BMPs necessary to meet state water quality standards.

Condition S3.A of the Permits requires Western Fabrication to have and fully implement a SWPPP that is consistent with permit requirements and update the SWPPP as necessary to maintain compliance with permit conditions. On information and belief, Western Fabrication has violated these requirements of the Permits each and every day during the last five years and continues to violate them because it does not have a SWPPP that is consistent with permit requirements, fully implemented, and updated as necessary.

The SWPPP fails to satisfy the requirements of Condition S3 of the Permits because it does not adequately describe BMPs. Condition S3.B.4 of the Permits requires that the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S3.A.3 of the Permits requires that the SWPPP include BMPs consistent with approved stormwater technical manuals or document how stormwater BMPs included in the SWPPP are demonstratively equivalent to the practices contained in the approved stormwater technical manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs. Western Fabrication's SWPPP does not comply with these requirements because it does not adequately describe BMPs, does not include BMPs consistent with approved stormwater technical

manuals, and does not include BMPs that are demonstratively equivalent to such BMPs with documentation of BMP adequacy.

Western Fabrication's SWPPP fails to satisfy the requirements of Condition S3.B.2 of the Permits because it fails to include a facility assessment. The SWPPP fails to include an adequate facility assessment because it does not describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, the regular business hours, and the seasonal variations in business hours or in industrial activities.

Western Fabrication's SWPPP fails to satisfy the requirements of Condition S3.B.1 of the Permits because it does not include a site map that identifies significant features, the stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

Western Fabrication's SWPPP fails to comply with Condition S3.B.2.b of the Permits because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants. The SWPPP does not identify all areas associated with loading and unloading of dry bulk materials or liquids, outdoor storage of materials or products, outdoor manufacturing and processing, on-site dust or particulate generating processes, on-site waste treatment, storage, or disposal, vehicle and equipment fueling, maintenance and/or cleaning, roofs or other surfaces exposed to air emissions from a manufacturing building or a process area, and roofs or other surfaces composed of materials that may be mobilized by stormwater as required by these permit conditions.

Western Fabrication's SWPPP does not comply with Condition S3.B.2.c of the Permits because it does not include an adequate inventory of materials. The SWPPP does not include an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution, a short narrative for each of the materials describing the potential for the pollutants to be present in stormwater discharge that is updated when data becomes available to verify the presence or absence of the pollutants, a narrative description of any potential sources of pollutants from past activities, materials and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater as required. The SWPPP does not include the method and location of on-site storage or disposal of such materials and a list of significant spills and significant leaks of toxic or hazardous pollutants as these permit conditions require.

Western Fabrication's SWPPP does not comply with Condition S3.B.3 of the Permits because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance, and modification.

Condition S3.B.4 of the Permits requires that permittees include in their SWPPPs and implement certain mandatory BMPs unless site conditions render the BMPs unnecessary, infeasible, or an alternative and equally effective BMPs are provided. Western Fabrication is in violation of this requirement because it has failed to include in its SWPPP and implement the mandatory BMPs of the Permits.

Western Fabrication's SWPPP does not comply with Condition S3.B.4.b.i of the Permits because it does not include adequate required operational source control BMPs in the following categories: good housekeeping (including definition of ongoing maintenance and cleanup of areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each task); spill prevention and emergency cleanup plan (including BMPs to prevent spills that can contaminate stormwater, for material handling procedures, storage requirements, cleanup equipment and procedures, and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, material management practices, how training will be conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, including identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how Western Fabrication will comply with signature and record retention requirements, and certification of compliance with the SWPPP and Permit).

Western Fabrication's SWPPP does not comply with Condition S3.B.4.b.i.7 of the Permits because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges to stormwater sewers, or to surface waters and ground waters of the state.

Western Fabrication's SWPPP does not comply with Condition S3.B.4.b.ii of the Permits because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff. Western Fabrication's SWPPP does not comply with Condition S3.B.4.b.iii of the Permits because it does not include treatment BMPs as required.

Western Fabrication's SWPPP fails to comply with Condition S3.B.4.b.v of the Permits because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.

Western Fabrication's SWPPP fails to satisfy the requirements of Condition S3.B.5 of the Permits because it fails to include an adequate stormwater sampling plan as required. The SWPPP does not include a sampling plan that identifies points of discharge to surface waters, storm sewers, or discrete ground water infiltration locations, documents why each discharge point is not sampled, identifies each sampling point by its unique identifying number, identifies staff responsible for conducting stormwater sampling, specifies procedures for sampling collection and handling, specifies procedures for sending samples to the a laboratory, identifies parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods, and that specifies the procedure for submitting the results to Ecology.

IV. MONITORING AND REPORTING VIOLATIONS.

A. Failure to Collect Quarterly Samples.

Condition S4.B of the Permits requires Western Fabrication to collect a sample of its stormwater discharge once during every calendar quarter. Conditions S3.B.5.b and S4.B.2.c of the Permits require Western Fabrication to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls, in which case only one of the substantially identical outfalls must be sampled. These conditions set forth sample collection criteria, but require the collection of a sample even if the criteria cannot be met.

Western Fabrication violated these requirements by failing to collect stormwater samples at any of its discharge points during the third quarter of 2010, the second and third quarters of 2011, the third quarter of 2012, the first and fourth quarters of 2013, and the third quarter of 2014.

Western Fabrication has also violated and continues to violate these conditions because it does not sample each distinct point of discharge off-site each quarter. These violations have occurred and continue to occur each and every quarter during the last five years that Western Fabrication was and is required to sample its stormwater discharges, including the quarters in which it collected stormwater discharge samples from some, but not all, points of discharge. These violations will continue until Western Fabrication commences monitoring all distinct points of discharge.

B. Failure to Analyze Quarterly Samples.

Condition S5.A.1 of the Permits requires Western Fabrication to analyze stormwater samples collected quarterly for turbidity, pH, total copper, total zinc, total lead, petroleum hydrocarbons, and oil sheen.

Western Fabrication violated this condition by failing to analyze stormwater samples for any of the required parameters during the third quarter of 2010, the second and third quarters of 2011, the third quarter of 2012, the first and fourth quarters of 2013, and the third quarter of 2014. Western Fabrication violated these requirements by failing to analyze stormwater samples for turbidity, pH, total copper, total lead, petroleum hydrocarbons, and oil

sheen during the fourth quarter of 2012, and the second quarter of 2013. Western Fabrication further violated this condition by failing to analyze stormwater samples for total hydrocarbons during the first, second, and fourth quarters of 2010, the first and fourth quarters of 2011, the first and second quarters of 2012, and the first and second quarters of 2014.

C. Failure to Timely Submit Discharge Monitoring Reports.

Condition S9.A of the Permits require Western Fabrication to use DMR forms provided or approved by Ecology to summarize, report and submit monitoring data to Ecology. For each monitoring period (calendar quarter) a DMR must be completed and submitted to Ecology not later than 45 days after the end of the monitoring period. Western Fabrication has violated these conditions by failing to submit a DMR within the time prescribed for the second quarter of 2011, the third and fourth quarters of 2012, the first and second quarters of 2013, and the third quarter of 2014.

D. Failure to Comply with Visual Monitoring Requirements.

Condition S7.A of the Permits requires that monthly visual inspections be conducted at the facility by qualified personnel. Each inspection is to include observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged, observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharges, observations for the presence of illicit discharges, a verification that the descriptions of potential pollutant sources required by the permit are accurate, a verification that the site map in the SWPPP reflects current conditions, and an assessment of all BMPs that have been implemented (noting the effectiveness of the BMPs inspected, the locations of BMPs that need maintenance, the reason maintenance is needed and a schedule for maintenance, and locations where additional or different BMPs are needed).

Condition S7.C of the Permits requires that Western Fabrication record the results of each inspection in an inspection report or checklist that documents the observations, verifications, and assessments required. The report/checklist must include the time and date of the inspection, the locations inspected, a statement that, in the judgment of the person conducting the inspection and the responsible corporate officer, the facility is either in compliance or out of compliance with the SWPPP and the Permits, a summary report and schedule of implementation of the remedial actions that Western Fabrication plans to take if the site inspection indicates that the facility is out of compliance, the name, title, signature and certification of the person conducting the facility inspection, and a certification and signature of the responsible corporate officer or a duly authorized representative.

Western Fabrication is in violation of these requirements of Condition S7 of the Permits because, during the last five years, it has failed to conduct each of the requisite visual monitoring and inspections, failed to prepare and maintain the requisite inspection reports or checklists, and failed to make the requisite certifications and summaries.

V. CORRECTIVE ACTION VIOLATIONS.

A. Violations of the Level One Requirements of the Permits.

Condition S8.B of the Permits requires Western Fabrication take specified actions, called a "Level One Corrective Action," each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range for pH. Condition S8.A of the 2015 Permit requires that Western Fabrication implement any Level One Corrective Action required by the 2010 Permit.

As described by Condition S8.B of the Permits, a Level One Corrective Action requires Western Fabrication: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits and contains the correct BMPs from the applicable Stormwater Management Manual; (2) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges and sign and certify the revised SWPPP in accordance with Condition S3 of the Permits; and (3) summarize the Level One Corrective Action in the Annual Report required under Condition S9.B of the Permits. Condition S8.B.3 of the Permits requires that Western Fabrication implement the revised SWPPP as soon as possible, and no later than the DMR due date for the quarter the benchmark was exceeded.

Condition S5.A and Table 2 of the Permits establish the following applicable benchmarks: turbidity 25 NTU; pH 5 – 9 SU; no visible oil sheen; total copper 14 µg/L; and total zinc 117 µg/L. Condition S5.B and Table 3 of the Permits establish the following additional benchmarks that are applicable to Western Fabrication: total lead 81.6 µg/L and total petroleum hydrocarbons 10 mg/L.

Western Fabrication has violated the requirements of the Permits described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required review, revision, and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each time during the last five years that quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH, including the benchmark excursions identified in Table 1 in Section II.A of this letter.

These benchmark excursions are based upon information currently available to Columbia Riverkeeper from Ecology's publicly available records. Columbia Riverkeeper provides notice of its intent to sue Western Fabrication for failing to comply with all of the Level One Corrective Action requirements described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each time during the last five years its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH, including the benchmark excursions listed in Table 1 above.

B. Violations of the Level Two Requirements of the Permits.

Condition S8.C of the Permits requires Western Fabrication take specified actions, called a "Level Two Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for pH for any two quarters during a calendar year. Condition S8.A of the 2015 Permit requires that Western Fabrication implement any Level Two Corrective Action required by the 2010 Permit.

As described by Condition S8.C of the Permits, a Level Two Corrective Action requires Western Fabrication: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the 2010 Permit; (2) make appropriate revisions to the SWPPP to include additional structural source control BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and sign and certify the revised SWPPP in accordance with Condition S3 of the Permits; and (3) summarize the Level Two Corrective Action (planned or taken) in the Annual Report required under Condition S9.B of the Permits. Condition S8.C.4 of the Permits requires that Western Fabrication implement the revised SWPPP according to Condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than August 31st of the following year.

The Permits establishes the benchmarks applicable to Western Fabrication described in Section V.A of this notice of intent to sue letter.

Western Fabrication has violated the requirements of the Permits described above by failing to conduct a Level Two Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs to ensure that all points of discharge from the facility meet benchmarks (not just the sampled point of discharge), including additional structural source control BMPs, and the required summarization in the annual report each time during the last five years its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH for any two quarters during a calendar year. As indicated in Table 1 in Section II.A of this letter, these violations include, but are not limited to, Western Fabrication's failure to fulfill these obligations for zinc triggered by its stormwater sampling during the calendar years of 2011 and 2013 and for turbidity and zinc triggered by its stormwater sampling during the calendar year of 2014.

The benchmark excursions identified in Table 1 of this notice of intent to sue letter are based upon information currently available to Columbia Riverkeeper from Ecology's publicly available records. Columbia Riverkeeper provides notice of its intent to sue Western Fabrication for failing to comply with all of the Level Two Corrective Action requirements each and every time quarterly stormwater sample results exceeded an applicable benchmark value or were outside the benchmark range for pH for any two quarters during a calendar year, including any such excursions that are not reflected in Table 1 above, during the last five years.

C. Violations of the Level Three Requirements of the Permits.

Condition S8.D of the Permits requires Western Fabrication take specified actions, called a "Level Three Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for pH for any three quarters during a calendar year. Condition S8.A of the 2015 Permit requires that Western Fabrication implement any Level Three Corrective Action required by the 2010 Permit.

As described by Condition S8.D of the 2010 Permit, a Level Three Corrective Action requires that Western Fabrication: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the 2010 Permit; (2) make appropriate revisions to the SWPPP to include additional treatment BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and additional operational and/or structural source control BMPs if necessary for proper function and maintenance of treatment BMPs, and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the 2010 Permit; and (3) summarize the Level Three Corrective Action (planned or taken) in the Annual Report required under Condition S9.B of the 2010 Permit, including information on how monitoring, assessment, or evaluation information was (or will be) used to determine whether existing treatment BMPs will be modified/enhanced, or it new/additional treatment BMPs will be installed. Condition S8.D.2.b of the 2010 Permit requires that a licensed professional engineer, geologist, hydrogeologist, of certified professional in storm water quality must design and stamp the portion of the SWPPP that addresses stormwater treatment structures or processes.

Condition S8.D.3 of the 2010 Permit requires that, before installing BMPs that require the site-specific design or sizing of structures, equipment, or processes to collect, convey, treat, reclaim, or dispose of industrial stormwater, Western Fabrication submit an engineering report, plans, and specifications, and an operations and maintenance manual to Ecology for review in accordance with chapter 173-204 of the Washington Administrative Code. The engineering report must be submitted no later than the May 15 prior to the Level Three Corrective Action Deadline. The plans and specifications and the operations and maintenance manual must be submitted to Ecology at least 30 days before construction/installation.

Condition S8.D.5 of the 2010 Permit requires that Western Fabrication fully implement the revised SWPPP according to condition S3 of the 2010 Permit and the applicable stormwater management manual as soon as possible, and no later than September 30th of the following year.

The Permits establishes the benchmarks applicable to Western Fabrication described in Section V.A of this notice of intent to sue letter.

Western Fabrication has violated the requirements of the Permits described above by failing to conduct a Level Three Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, including the requirement to have a specified professional design and stamp the portion of the SWPPP

pertaining to treatment, the required implementation of additional BMPs, including additional treatment BMPs to ensure that all points of discharge from the facility meet benchmarks (not just the sampled point of discharge), the required submission of an engineering report, plans, specifications, and an operations and maintenance plan, and the required summarization in the annual report each time during the last five years its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH for any three quarters during a calendar year. As indicated in Table 1 in Section II.A of this letter, these violations include, but are not limited to, Western Fabrication's failure to fulfill these obligations for zinc triggered by its stormwater sampling during calendar years 2010 and 2012.

The benchmark excursions identified in Table 1 of this notice of intent to sue letter are based upon information currently available to Columbia Riverkeeper from Ecology's publicly available records. Columbia Riverkeeper provides notice of its intent to sue Western Fabrication for failing to comply with all of the Level Three Corrective Action requirements each and every time quarterly stormwater sample results exceeded an applicable benchmark value or were outside the benchmark range for pH for any three quarters during a calendar year, including any such excursions that are not reflected in Table 1 above, during the last five years.

VI. VIOLATIONS OF THE ANNUAL REPORT REQUIREMENTS.

Condition S9.B of the Permits requires Western Fabrication to submit an accurate and complete annual report to Ecology no later than May 15 of each year. The annual report must include corrective action documentation as required in Conditions S8.B through S8.D. If a corrective action is not yet completed at the time of submission of the annual report, Western Fabrication must describe the status of any outstanding corrective action. Specific information to be included in the annual report is identification of the conditions triggering the need for corrective action, description of the problem and identification of dates discovered, summary of any Level 1, 2, or 3 corrective actions completed during the previous calendar year, including the dates corrective actions completed, and description of the status of any Level 2 or 3 corrective actions triggered during the previous calendar year, including identification of the date Western Fabrication expects to complete corrective actions. Western Fabrication has violated this condition by failing to include all of the required information in the annual reports it submitted for years 2010, 2011, 2012, and 2013.

The annual report submitted by Western Fabrication for 2010 (submitted on May 16, 2011) does not include all of the required information. The report does not provide any of the required information for each of the Level One Corrective Actions triggered in 2010, including those for copper and pH. The annual report provides inadequate and incomplete information for the Level Three Corrective Action triggered for zinc in 2010, including the description of the conditions triggering the corrective action, the BMPs (including treatment) to be implemented as part of the Level Three Corrective Action, and the implementation schedule. The annual report does not include information on how monitoring, assessment, or evaluation information was (or will be) used to determine whether existing treatment BMPs will be modified/enhanced, or if new/additional treatment BMPs will be installed as required by Condition S8.D.4.

The annual report submitted by Western Fabrication for 2011 (submitted on May 9, 2012) does not include all of the required information. For example, the report does not described the completion or status of the Level Three Corrective Action triggered for zinc in 2010 and required to be completed in 2011, or the information required by Condition S8.D.4 of the 2010 Permit for that Level Three Corrective Action. The annual report does not describe the conditions triggering a Level One Corrective action for turbidity and a Level Two Corrective Action for zinc in 2011. The report does not it describe structural BMPs to be implemented as part of the Level Two Corrective Action or a schedule for such implementation.

Western Fabrication's annual report submitted for 2012 (submitted on January 25, 2013) does not include all of the required information. The annual report does not describe the status of the Level Two Corrective Action triggered for zinc in 2011 that was to be completed in 2012. The annual report does not include information identifying the conditions triggering a Level Three Corrective Action for zinc in 2012, describing the problems, or identifying the dates the problems were discovered. The report provides an inadequate and incomplete description of measures taken as part of the Level Three Corrective Action for zinc triggered in 2012. The annual report does not include information on how monitoring, assessment, or evaluation information was (or will be) used to determine whether existing treatment BMPs will be modified/enhanced, or if new/additional treatment BMPs will be installed as required by Condition S8.D.4 of the 2010 Permit. Further, while the 2012 annual report claims Western Fabrication painted the roof in 2012, the 2013 annual report notes the discovery of zinc coating on the building roof and rust, noting a plan to paint and clean the roof.

Western Fabrication's annual report submitted for 2013 (submitted on May 21, 2014) does not include all of the required information. For example, the report does not provide any of the required information for the Level One Corrective Action for pH triggered in 2013. The report does not described the completion or status of the Level Three Corrective Action triggered for zinc in 2012 that was to be completed in 2013, or the information required by Condition S8.D.4 of the 2010 Permit for that Level Three Corrective Action. While Western Fabrication triggered the requirements of a Level Two Corrective Action for zinc in 2013, the annual report only acknowledges a Level One Corrective Action for this parameter.

VII. VIOLATIONS OF THE RECORDKEEPING REQUIREMENTS.

A. Failure to Record Information.

Condition S4.B.3 of the Permits requires Western Fabrication to record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if Western Fabrication collected the sample within the first 30 minutes of stormwater discharge event, an explanation of why Western Fabrication could not collect a sample within the first 30 minutes of a stormwater discharge event, the sample location, method of sampling and of preservation, and the individual performing the sampling. Upon

information and belief, Western Fabrication is in violation of these conditions as it has not recorded each of these specified items for each sample taken during the last five years.

B. Failure to Retain Records.

Condition S9.C of the Permits requires Western Fabrication to retain for a minimum of five years a copy of the Permits, a copy of Western Fabrication's coverage letter, records of all sampling information, inspection reports including required documentation, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required reports, and records of all data used to complete the application for the Permits. Upon information and belief, Western Fabrication is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation during the last five years.

VIII. REQUEST FOR SWPPP.

Pursuant to Condition S9.F of the 2015 Permit, Columbia Riverkeeper hereby requests that Western Fabrication provide a copy of, or access to, its SWPPP complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the letterhead address.

Should Western Fabrication fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the 2015 Permit, it will be in violation of that condition, which violation shall also be subject to this notice of intent to sue and any ensuing lawsuit.

IX. Party Giving Notice of Intent to Sue.

The full name, address, and telephone number of the party giving notice is:

Columbia Riverkeeper
111 Third St.
Hood River, OR 97031
(541) 387-3030

X. Attorneys Representing Riverkeeper.

The attorneys representing Columbia Riverkeeper in this matter are:

Brian A. Knutsen
Smith & Lowney, PLLC
917 S.W. Oak Street, Suite 300
Portland, OR 97205
(971) 373-8692

Meredith Crafton
Smith & Lowney, PLLC
2317 E. John St.
Seattle, WA 98112
(206) 860-2883

Lauren Goldberg, Staff Attorney
Columbia Riverkeeper
111 Third St.
Hood River, OR 97031
(541) 965-0985
(Licensed in Oregon)

XI. CONCLUSION.

The above-described violations reflect those indicated by the information currently available to Columbia Riverkeeper. These violations are ongoing. Columbia Riverkeeper intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

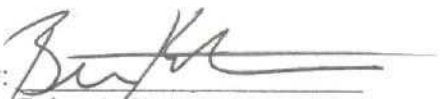
Under Section 309(d) of the CWA, 33 USC § 1319(d), each of the above-described violations subjects the violator to a penalty of up to $37,500 per day. In addition to civil penalties, Columbia Riverkeeper will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 USC § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 USC § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Columbia Riverkeeper believes that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. Columbia Riverkeeper intends, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against Western Fabrication Center, L.L.C. under Section 505(a) of the Clean Water Act.

Columbia Riverkeeper is willing to discuss effective remedies for the violations described in this letter and settlement terms during the 60-day notice period. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within 10 days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Very truly yours,

SMITH & LOWNEY, PLLC

By: 
Brian A. Knutsen

cc: Gina McCarthy, Administrator, U.S. EPA
Dennis McLerran, Region 10 Administrator, U.S. EPA
Maia Bellon, Director, Washington Department of Ecology

Precipitation Data
Kelso-Longview (KKLS)
Source:
http://www.wunderground.com/

2010 Precipitation Data

Date	Precipitation (inches)	Event
January		
1/1/2010	0.36	
1/2/2010	0.05	
1/3/2010	0	
1/4/2010	0.6	
1/5/2010	0.17	
1/6/2010	0.16	
1/7/2010	0	
1/8/2010	0.43	
1/9/2010	0	
1/10/2010	0	
1/11/2010	0.17	
1/12/2010	0.31	
1/13/2010	0.42	
1/14/2010	0.07	
1/15/2010	0.6	
1/16/2010	0.07	
1/17/2010	0.12	
1/18/2010	0.08	
1/19/2010	0.05	
1/20/2010	0	
1/21/2010	0	
1/22/2010	0.07	
1/23/2010	0	
1/24/2010	0.27	
1/25/2010	0.08	
1/26/2010	0	
1/27/2010	0	
1/28/2010	0	
1/29/2010	0	
1/30/2010	0.06	
1/31/2010	0.01	
February		
2/1/2010	0.28	
2/2/2010	0	
2/3/2010	0.02	
2/4/2010	0.11	
2/5/2010	0.03	
2/6/2010	0	
2/7/2010	0	
2/8/2010	0	
2/9/2010	0	
2/10/2010	0.27	
2/11/2010	0.06	
2/12/2010	0.27	
2/13/2010	0.05	
2/14/2010	0.29	
2/15/2010	0.01	
2/16/2010	0.12	
2/17/2010	0	
2/18/2010	0	
2/19/2010	0	
2/20/2010	0	
2/21/2010	0	
2/22/2010	0	
2/23/2010	0.17	
2/24/2010	0.1	
2/25/2010	0	
2/26/2010	0.38	
2/27/2010	0.07	
2/28/2010	0	
March		
3/1/2010	0	
3/2/2010	0.47	
3/3/2010	0	
3/4/2010	0	
3/5/2010	0	
3/6/2010	0	
3/7/2010	0.12	
3/8/2010	0	
3/9/2010	0.02	
3/10/2010	0.08	

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
3/11/2010	0		4/8/2010	0.38		5/2/2010	0	
3/16/2010	0.04		4/9/2010	0.03		5/3/2010	0.24	
3/17/2010	0.04		4/10/2010	0		5/4/2010	0.13	
3/18/2010	0		4/11/2010	0.01		5/5/2010	0.06	
3/19/2010	0		4/12/2010	0.18		5/6/2010	0	
3/20/2010	0		4/13/2010	0.06		5/7/2010	0	
3/21/2010	0.13		4/14/2010	0		5/8/2010	0	
3/22/2010	0.03		4/15/2010	0.03		5/9/2010	0	
3/23/2010	0		4/16/2010	0		5/10/2010	0.17	
3/24/2010	0		4/17/2010	0.06		5/11/2010	0	
3/25/2010	0.26		4/18/2010	0.01		5/12/2010	0	
3/26/2010	0.28		4/19/2010	0		5/13/2010	0	
3/27/2010	0		4/20/2010	0.07		5/14/2010	0	
3/28/2010	0.2		4/21/2010	0		5/15/2010	0	
3/29/2010	0.42		4/22/2010	0		5/16/2010	0	
3/30/2010	0.2		4/23/2010	0		5/17/2010	0.11	
3/31/2010	0.01		4/24/2010	0.03		5/18/2010	0.27	
April			4/25/2010	0		5/19/2010	0.27	
4/1/2010	0.06		4/26/2010	0.1		5/20/2010	0.24	
4/2/2010	0.66		4/27/2010	0.36		5/21/2010	0.51	
4/3/2010	0.16		4/28/2010	0.25		5/22/2010	0.08	
4/4/2010	0.18		4/29/2010	0.13		5/23/2010	0.28	
4/5/2010	0.05		4/30/2010	0.08		5/24/2010	0.02	
4/6/2010	0.29		**May**			5/25/2010	0.11	
4/7/2010	0.02	T-Storm	5/1/2010	0		5/26/2010	0.47	

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
5/27/2010	0.09		6/23/2010	0		7/17/2010	0	
5/28/2010	0.51		6/24/2010	0		7/18/2010	0	
5/29/2010	0.24		6/25/2010	0		7/19/2010	0	
5/30/2010	0		6/26/2010	0		7/20/2010	0	
5/31/2010	0.53		6/27/2010	0		7/21/2010	0	
June			6/28/2010	0		7/22/2010	0	
6/1/2010	0.01		6/29/2010	0		7/23/2010	0	
6/2/2010	0.27		6/30/2010	0		7/24/2010	0	
6/3/2010	0		**July**			7/25/2010	0	
6/4/2010	0.24		7/1/2010	0.12		7/26/2010	0	
6/5/2010	0		7/2/2010	0		7/27/2010	0	
6/6/2010	0.77		7/3/2010	0		7/28/2010	0	
6/7/2010	0		7/4/2010	0		7/29/2010	0	
6/8/2010	0		7/5/2010	0		7/30/2010	0	
6/9/2010	0.82		7/6/2010	0		7/31/2010	0	
6/10/2010	0.2		7/7/2010	0.22		**August**		
6/11/2010	0		7/8/2010	0		8/1/2010	0	
6/12/2010	0		7/9/2010	0		8/2/2010	0	
6/13/2010	0		7/10/2010	0		8/3/2010	0	
6/14/2010	0		7/11/2010	0		8/4/2010	0	
6/15/2010	0.08		7/12/2010	0		8/5/2010	0	
6/16/2010	0.17		7/13/2010	0		8/6/2010	0	
6/17/2010	0		7/14/2010	0		8/7/2010	0.02	
6/21/2010	0		7/15/2010	0		8/8/2010	0.01	
6/22/2010	0		7/16/2010	0		8/9/2010	0	

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
8/10/2010	0		9/3/2010	0		10/1/2010	0	
8/11/2010	0		9/4/2010	0		10/2/2010	0	
8/12/2010	0		9/5/2010	0		10/3/2010	0	
8/13/2010	0		9/6/2010	0		10/4/2010	0	
8/14/2010	0		9/7/2010	0.06		10/5/2010	0	
8/15/2010	0		9/8/2010	0.05		10/6/2010	0	
8/16/2010	0		9/9/2010	0		10/7/2010	0	
8/17/2010	0		9/10/2010	0		10/8/2010	0	
8/18/2010	0		9/11/2010	0		10/9/2010	0.42	
8/19/2010	0		9/12/2010	0		10/10/2010	0.39	
8/20/2010	0		9/13/2010	0		10/11/2010	0	
8/21/2010	0		9/14/2010	0		10/12/2010	0.85	
8/22/2010	0		9/15/2010	0.07		10/13/2010	0	
8/23/2010	0		9/16/2010	0.07		10/14/2010	0.01	
8/24/2010	0		9/17/2010	0.04		10/15/2010	0.01	
8/25/2010	0		9/18/2010	0.04		10/16/2010	0	
8/26/2010	0		9/19/2010	0.11		10/17/2010	0	
8/27/2010	0		9/20/2010	0.06		10/18/2010	0	
8/28/2010	0		9/21/2010	0		10/19/2010	0	
8/29/2010	0		9/22/2010	0		10/20/2010	0	
8/30/2010	0		9/23/2010	0.1		10/21/2010	0	
8/31/2010	0.16		9/24/2010	0		10/22/2010	0	
September			9/29/2010	0		10/23/2010	0.11	
9/1/2010	0.14		9/30/2010	0		10/24/2010	0.58	
9/2/2010	0		**October**			10/25/2010	0.81	

Date	Precipitation (inches)	Event
10/26/2010	1.18	
10/27/2010	0	
10/28/2010	0.09	
10/29/2010	0	
10/30/2010	0.05	
10/31/2010	0.01	
November		
11/1/2010	0.87	
11/2/2010	0	
11/3/2010	0	
11/4/2010	0	
11/5/2010	0	
11/6/2010	0.06	
11/7/2010	0.15	
11/8/2010	0.06	
11/9/2010	0.29	
11/10/2010	0.04	
11/11/2010	0.16	
11/12/2010	0	
11/13/2010	0.03	
11/14/2010	0.18	
11/15/2010	0.14	
11/16/2010	0.1	
11/17/2010	0.98	
11/18/2010	0.15	
11/19/2010	0.2	
11/20/2010	0.11	
11/21/2010	0.09	
11/22/2010	0.63	
11/23/2010	0	
11/24/2010	0	
11/25/2010	0.01	
11/26/2010	0.19	
11/27/2010	0.01	
11/28/2010	0	
11/29/2010	0.17	
11/30/2010	0.43	
December		
12/1/2010	0.04	
12/2/2010	0.01	
12/3/2010	0	
12/4/2010	0	
12/5/2010	0	
12/6/2010	0	
12/7/2010	0.17	
12/8/2010	0.61	
12/9/2010	0.82	
12/10/2010	0.17	
12/11/2010	0.91	
12/12/2010	0.24	
12/13/2010	0.08	
12/14/2010	0.42	
12/15/2010	0.34	
12/16/2010	0	
12/17/2010	0	
12/18/2010	0.35	
12/19/2010	0.09	
12/20/2010	0.14	
12/21/2010	0.04	
12/22/2010	0	
12/24/2010	0.12	
12/25/2010	0.12	
12/26/2010	0.47	T-Storm
12/27/2010	0.8	
12/28/2010	0.72	
12/29/2010	0.07	
12/30/2010	0	
12/31/2010	0	
2011 Precipitation Data		
January		
1/1/2011	0	
1/2/2011	0	
1/3/2011	0	
1/4/2011	0	

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
1/5/2011	0.2		1/30/2011	0		2/23/2011	0.15	
1/6/2011	0.3		1/31/2011	0		2/24/2011	0.04	
1/7/2011	0.08		**February**			2/25/2011	0.16	
1/8/2011	0.03		2/1/2011	0		2/26/2011	0	
1/9/2011	0.06		2/2/2011	0		2/27/2011	0.21	
1/10/2011	0		2/3/2011	0		2/28/2011	1.46	
1/11/2011	0		2/4/2011	0.08		**March**		
1/12/2011	0.65		2/5/2011	0		3/1/2011	0.33	
1/13/2011	0.61		2/6/2011	0.06		3/2/2011	0.17	
1/14/2011	0.13		2/7/2011	0.28		3/3/2011	0.07	
1/15/2011	0.73		2/8/2011	0.02		3/4/2011	0.17	
1/16/2011	1.72		2/9/2011	0		3/5/2011	0.01	
1/17/2011	0.12		2/10/2011	0		3/6/2011	0	
1/18/2011	0.24		2/11/2011	0		3/7/2011	0	
1/19/2011	0		2/12/2011	0.35		3/8/2011	0.07	
1/20/2011	0		2/13/2011	0.09		3/9/2011	0.56	
1/21/2011	0.33		2/14/2011	0.2		3/10/2011	0.27	
1/22/2011	0		2/15/2011	0.35		3/11/2011	0	
1/23/2011	0.03		2/16/2011	0.14		3/12/2011	0.31	
1/24/2011	0.01		2/17/2011	0.06		3/13/2011	0.38	
1/25/2011	0		2/18/2011	0.22		3/14/2011	0.31	
1/26/2011	0		2/19/2011	0		3/15/2011	0.24	
1/27/2011	0		2/20/2011	0		3/16/2011	0.19	
1/28/2011	0.03		2/21/2011	0.05		3/17/2011	0.02	
1/29/2011	0.12		2/22/2011	0.25		3/18/2011	0.15	

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
3/19/2011	0		4/12/2011	0		5/6/2011	0.16	
3/20/2011	0.07		4/13/2011	0.08		5/7/2011	0.01	
3/21/2011	0.07		4/14/2011	0.27		5/8/2011	0.17	
3/22/2011	0.01		4/15/2011	0.44		5/9/2011	0	
3/23/2011	0		4/16/2011	0		5/10/2011	0	
3/24/2011	0.29		4/17/2011	0		5/11/2011	0.31	
3/25/2011	0		4/18/2011	0		5/12/2011	0.02	
3/26/2011	0.22		4/19/2011	0.04		5/13/2011	0	
3/27/2011	0.09		4/20/2011	0		5/14/2011	0.05	
3/28/2011	0.01		4/21/2011	0.01		5/15/2011	0.56	
3/29/2011	0.24		4/22/2011	0		5/16/2011	0.01	
3/30/2011	0.64		4/23/2011	0		5/17/2011	0	
3/31/2011	0.27		4/24/2011	0.21		5/18/2011	0	
April			4/25/2011	0.69		5/19/2011	0	
4/1/2011	0		4/26/2011	0.26		5/20/2011	0	
4/2/2011	0.05		4/27/2011	0.09		5/21/2011	0.02	
4/3/2011	0		4/28/2011	0.33		5/22/2011	0.03	
4/4/2011	0.62		4/29/2011	0.02		5/23/2011	0.02	
4/5/2011	0.06		4/30/2011	0		5/24/2011	0	
4/6/2011	0.2		**May**			5/25/2011	0.18	
4/7/2011	0.02		5/1/2011	0		5/26/2011	0.16	
4/8/2011	0		5/2/2011	0.1		5/27/2011	0.24	
4/9/2011	0		5/3/2011	0.13		5/28/2011	0.01	
4/10/2011	0.08		5/4/2011	0		5/29/2011	0.02	
4/11/2011	0.22		5/5/2011	0.15		5/30/2011	0	

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
5/31/2011	0.09		6/24/2011	0		7/18/2011	0	
June			6/25/2011	0		7/19/2011	0	
6/1/2011	0.01		6/26/2011	0		7/20/2011	0.04	
6/2/2011	0.42		6/27/2011	0.01		7/21/2011	0.03	
6/3/2011	0.03		6/28/2011	0.07		7/22/2011	0	
6/4/2011	0		6/29/2011	0.08		7/23/2011	0	
6/5/2011	0		6/30/2011	0.05		7/24/2011	0	
6/6/2011	0		**July**			7/25/2011	0	
6/7/2011	0		7/1/2011	0		7/26/2011	0	
6/8/2011	0		7/2/2011	0		7/27/2011	0	
6/9/2011	0		7/3/2011	0		7/28/2011	0	
6/10/2011	0		7/4/2011	0		7/29/2011	0	
6/11/2011	0		7/5/2011	0		7/30/2011	0	
6/12/2011	0		7/6/2011	0		7/31/2011	0	
6/13/2011	0.03		7/7/2011	0		**August**		
6/14/2011	0		7/8/2011	0		8/1/2011	0	
6/15/2011	0.02		7/9/2011	0		8/2/2011	0	
6/16/2011	0		7/10/2011	0		8/3/2011	0	
6/17/2011	0		7/11/2011	0		8/4/2011	0	
6/18/2011	0.2		7/12/2011	0.25		8/5/2011	0	
6/19/2011	0		7/13/2011	0.19		8/6/2011	0	
6/20/2011	0		7/14/2011	0.01		8/7/2011	0	
6/21/2011	0		7/15/2011	0		8/8/2011	0	
6/22/2011	0		7/16/2011	0.61		8/9/2011	0	
6/23/2011	0.03		7/17/2011	0.07		8/10/2011	0	

Date	Precipitation (inches)	Event
8/11/2011	0	
8/12/2011	0	
8/13/2011	0	
8/14/2011	0	
8/15/2011	0	
8/16/2011	0	
8/17/2011	0	
8/18/2011	0	
8/19/2011	0	
8/20/2011	0	
8/21/2011	0	
8/22/2011	0	
8/23/2011	0	
8/24/2011	0	
8/25/2011	0	
8/26/2011	0	
8/27/2011	0	
8/28/2011	0	
8/29/2011	0	
8/30/2011	0	
8/31/2011	0	
September		
9/1/2011	0	
9/2/2011	0	
9/3/2011	0	
9/4/2011	0	
9/5/2011	0	
9/6/2011	0	
9/7/2011	0	
9/8/2011	0	
9/9/2011	0	
9/10/2011	0	
9/11/2011	0	
9/12/2011	0	
9/13/2011	0	
9/14/2011	0	
9/15/2011	0	
9/16/2011	0.01	
9/17/2011	0.16	
9/18/2011	0.34	
9/19/2011	0.3	
9/20/2011	0	
9/21/2011	0	
9/22/2011	0	
9/23/2011	0	
9/24/2011	0	
9/25/2011	0.12	
9/26/2011	0.19	
9/27/2011	0	
9/28/2011	0	
9/29/2011	0	
9/30/2011	0	
October		
10/1/2011	0	
10/2/2011	0.06	
10/3/2011	0.07	
10/4/2011	0.19	
10/5/2011	0.12	
10/6/2011	0.01	
10/7/2011	0.05	
10/8/2011	0	
10/9/2011	0.03	
10/10/2011	0.19	
10/11/2011	0.82	
10/12/2011	0.19	
10/13/2011	0	
10/14/2011	0	
10/15/2011	0.01	
10/16/2011	0	
10/17/2011	0	
10/18/2011	0	
10/19/2011	0	
10/20/2011	0.06	
10/21/2011	0.05	
10/22/2011	0.12	

Date	Precipitation (inches)	Event
10/23/2011	0.1	
10/24/2011	0	
10/25/2011	0	
10/26/2011	0	
10/27/2011	0	
10/28/2011	0.1	
10/29/2011	0.07	
10/30/2011	0.02	
10/31/2011	0	
November		
11/1/2011	0	
11/2/2011	0.24	
11/3/2011	0.01	
11/4/2011	0	T-Storm
11/5/2011	0.04	
11/6/2011	0	
11/7/2011	0	
11/8/2011	0	
11/9/2011	0	
11/10/2011	0	
11/11/2011	0.25	
11/12/2011	0.25	
11/13/2011	0.3	
11/14/2011	0.09	
11/15/2011	0	

Date	Precipitation (inches)	Event
11/16/2011	0.38	
11/17/2011	0.15	
11/18/2011	0.16	
11/19/2011	0.06	
11/20/2011	0	
11/21/2011	0.2	
11/22/2011	1.23	
11/23/2011	0.2	
11/24/2011	0.48	
11/25/2011	0.18	
11/26/2011	0	
11/27/2011	0.32	
11/28/2011	0	
11/29/2011	0.07	
11/30/2011	0.01	
December		
12/1/2011	0	
12/2/2011	0	
12/3/2011	0	
12/4/2011	0	
12/5/2011	0	
12/6/2011	0	
12/7/2011	0	
12/8/2011	0	
12/9/2011	0	

Date	Precipitation (inches)	Event
12/10/2011	0	
12/11/2011	0	
12/12/2011	0	
12/13/2011	0	
12/14/2011	0.03	
12/15/2011	0.02	
12/16/2011	0	
12/17/2011	0	
12/18/2011	0.02	
12/19/2011	0	
12/20/2011	0	
12/21/2011	0	
12/22/2011	0	
12/23/2011	0	
12/24/2011	0	
12/25/2011	0.36	
12/26/2011	0.01	
12/27/2011	0.56	
12/28/2011	0.81	
12/29/2011	0.46	
12/30/2011	0.54	
12/31/2011	0.01	

2012 Precipitation Data

January

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
1/1/2012	0		1/26/2012	0.12		2/19/2012	0	
1/2/2012	0.01		1/27/2012	0		2/20/2012	0.09	
1/3/2012	0		1/28/2012	0		2/21/2012	0.47	
1/4/2012	0.14		1/29/2012	0.46		2/22/2012	0.91	
1/5/2012	0.15		1/30/2012	0.03		2/23/2012	0.01	
1/6/2012	0.03		1/31/2012	0.02		2/24/2012	0.15	
1/7/2012	0		**February**			2/25/2012	0.42	
1/8/2012	0		2/1/2012	0.03		2/26/2012	0.26	
1/9/2012	0.07		2/2/2012	0		2/27/2012	0	
1/10/2012	0		2/3/2012	0		2/28/2012	0.17	
1/11/2012	0		2/4/2012	0		2/29/2012	0.64	
1/12/2012	0		2/5/2012	0		**March**		
1/13/2012	0		2/6/2012	0		3/1/2012	0.07	
1/14/2012	0.07		2/7/2012	0		3/2/2012	0	
1/15/2012	0.14		2/8/2012	0.06		3/3/2012	0.03	
1/16/2012	0.03		2/9/2012	0.19		3/4/2012	0	
1/17/2012	0.48		2/10/2012	0.03		3/5/2012	0.32	
1/18/2012	0.92		2/11/2012	0		3/6/2012	0.01	
1/19/2012	1.1		2/12/2012	0.01		3/7/2012	0	
1/20/2012	0.11		2/13/2012	0.09		3/8/2012	0	
1/21/2012	0.22		2/14/2012	0.08		3/9/2012	0	
1/22/2012	0.28		2/15/2012	0		3/10/2012	0.18	
1/23/2012	0		2/16/2012	0.13		3/11/2012	0.24	
1/24/2012	0.63		2/17/2012	0.25		3/12/2012	1.24	
1/25/2012	0.01		2/18/2012	0.57		3/13/2012	0.26	

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
3/14/2012	0.38		4/7/2012	0		5/1/2012	0.42	
3/15/2012	1.08		4/8/2012	0		5/2/2012	0.07	
3/16/2012	0.14		4/9/2012	0		5/3/2012	0.66	
3/17/2012	0.19		4/10/2012	0.01		5/4/2012	0.14	
3/18/2012	0.23		4/11/2012	0.38		5/5/2012	0	
3/19/2012	0.01		4/12/2012	0.04		5/6/2012	0	
3/20/2012	0.31		4/13/2012	0		5/7/2012	0	
3/21/2012	0.24		4/14/2012	0		5/8/2012	0	
3/22/2012	0.31		4/15/2012	0.06		5/9/2012	0	
3/23/2012	0		4/16/2012	0.26		5/10/2012	0	
3/24/2012	0		4/17/2012	0.04		5/11/2012	0	
3/25/2012	0		4/18/2012	0.08		5/12/2012	0	
3/26/2012	0.01		4/19/2012	0.24		5/13/2012	0	
3/27/2012	0.09		4/20/2012	0.04		5/14/2012	0	
3/28/2012	0.05		4/21/2012	0		5/15/2012	0	
3/29/2012	1.42		4/22/2012	0		5/16/2012	0	
3/30/2012	0.35		4/23/2012	0		5/17/2012	0	
3/31/2012	0.43		4/24/2012	0		5/18/2012	0	
April			4/25/2012	0.27		5/19/2012	0	
4/1/2012	0.17		4/26/2012	0.31		5/20/2012	0.22	
4/2/2012	0		4/27/2012	0.14		5/21/2012	0.67	
4/3/2012	0.04		4/28/2012	0.12		5/22/2012	0.33	
4/4/2012	0.23		4/29/2012	0.1		5/23/2012	0.11	
4/5/2012	0.05		4/30/2012	0.47		5/24/2012	0.42	
4/6/2012	0		**May**			5/25/2012	0.02	

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
5/26/2012	0.02		6/19/2012	0.27		7/13/2012	0	
5/27/2012	0		6/20/2012	0		7/14/2012	0	
5/28/2012	0		6/21/2012	0		7/15/2012	0	
5/29/2012	0		6/22/2012	0.32		7/16/2012	0.04	
5/30/2012	0		6/23/2012	1		7/17/2012	0	
5/31/2012	0.12		6/24/2012	0.19		7/18/2012	0	
June			6/25/2012	0		7/19/2012	0.13	
6/1/2012	0.25		6/26/2012	0.06		7/20/2012	0.06	
6/2/2012	0		6/27/2012	0		7/21/2012	0	
6/3/2012	0		6/28/2012	0.02		7/22/2012	0	
6/4/2012	0.38		6/29/2012	0.01		7/23/2012	0	
6/5/2012	0.41		6/30/2012	0.04		7/24/2012	0	
6/6/2012	0		**July**			7/25/2012	0	
6/7/2012	0.55		7/1/2012	0		7/26/2012	0	
6/8/2012	0.7		7/2/2012	0.01		7/27/2012	0	
6/9/2012	0.24		7/3/2012	0.07		7/28/2012	0	
6/10/2012	0		7/4/2012	0		7/29/2012	0	
6/11/2012	0		7/5/2012	0		7/30/2012	0	
6/12/2012	0		7/6/2012	0		7/31/2012	0	
6/13/2012	0		7/7/2012	0		**August**		
6/14/2012	0		7/8/2012	0		8/1/2012	0	
6/15/2012	0		7/9/2012	0		8/2/2012	0	
6/16/2012	0		7/10/2012	0		8/3/2012	0	
6/17/2012	0.02		7/11/2012	0		8/4/2012	0	
6/18/2012	0.04		7/12/2012	0		8/5/2012	0	

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
8/6/2012	0		9/5/2012	0		9/30/2012	0	
8/7/2012	0		9/6/2012	0		**October**		
8/8/2012	0		9/7/2012	0		10/1/2012	0	
8/9/2012	0		9/8/2012	0		10/2/2012	0	
8/10/2012	0		9/9/2012	0		10/3/2012	0	
8/11/2012	0		9/10/2012	0.03		10/4/2012	0	
8/12/2012	0		9/11/2012	0		10/5/2012	0	
8/13/2012	0		9/12/2012	0		10/6/2012	0	
8/14/2012	0		9/13/2012	0		10/7/2012	0	
8/15/2012	0		9/14/2012	0		10/8/2012	0	
8/16/2012	0		9/15/2012	0		10/9/2012	0	
8/17/2012	0		9/16/2012	0		10/10/2012	0	
8/18/2012	0		9/17/2012	0		10/11/2012	0	
8/19/2012	0		9/18/2012	0		10/12/2012	0.53	
8/20/2012	0		9/19/2012	0		10/13/2012	0.26	
8/21/2012	0		9/20/2012	0		10/14/2012	0.38	
8/22/2012	0		9/21/2012	0		10/15/2012	0.5	
8/23/2012	0		9/22/2012	0		10/16/2012	0.05	
8/30/2012	0		9/23/2012	0		10/17/2012	0.01	
8/31/2012	0		9/24/2012	0		10/18/2012	0.1	
September			9/25/2012	0		10/19/2012	0.84	
9/1/2012	0		9/26/2012	0		10/20/2012	0.3	
9/2/2012	0		9/27/2012	0		10/21/2012	0.09	
9/3/2012	0		9/28/2012	0		10/22/2012	0.21	
9/4/2012	0		9/29/2012	0		10/23/2012	0.21	

Date	Precipitation (inches)	Event
10/24/2012	0.1	
10/25/2012	0.04	
10/26/2012	0.01	
10/27/2012	0.93	
10/28/2012	0.57	
10/29/2012	0.69	
10/30/2012	0.46	
10/31/2012	0.82	
November		
11/1/2012	0.14	
11/2/2012	0.11	
11/3/2012	0.1	
11/4/2012	0.01	
11/5/2012	0	
11/6/2012	0.01	
11/7/2012	0.01	
11/8/2012	0	
11/9/2012	0	
11/10/2012	0	
11/11/2012	0.49	
11/12/2012	0.04	
11/13/2012	0.02	
11/14/2012	0.01	
11/15/2012	0	
11/16/2012	0.02	
11/17/2012	0.4	T-Storm
11/18/2012	1.08	
11/19/2012	1.96	
11/20/2012	0.35	
11/21/2012	0.29	
11/22/2012	0	
11/23/2012	0.67	
11/24/2012	0.01	
11/25/2012	0	
11/26/2012	0	
11/27/2012	0	
11/28/2012	0.01	
11/29/2012	0.15	
11/30/2012	1.06	
December		
12/1/2012	0.78	
12/2/2012	0.38	
12/3/2012	0.19	
12/4/2012	0.7	
12/5/2012	0.01	
12/6/2012	0.21	
12/7/2012	0.1	
12/8/2012	0.04	
12/9/2012	0.01	
12/10/2012	0	
12/11/2012	0.24	
12/12/2012	0.11	
12/13/2012	0.06	
12/14/2012	0.24	
12/15/2012	0.46	
12/16/2012	0.96	
12/17/2012	0.55	
12/18/2012	0.3	
12/19/2012	0.91	
12/20/2012	0.6	
12/21/2012	0.07	
12/22/2012	0.21	
12/23/2012	0.35	
12/24/2012	0.1	
12/25/2012	0.45	
12/26/2012	0.15	
12/27/2012	0.01	
12/28/2012	0	
12/29/2012	0.01	T-Storm
12/30/2012	0	
12/31/2012	0.08	
2013 Precipitation Data		
January		
1/1/2013	0	

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
1/2/2013	0		1/27/2013	0.19		2/20/2013	0.09	
1/3/2013	0		1/28/2013	0.7		2/21/2013	0.11	
1/4/2013	0		1/29/2013	0.28		2/22/2013	0.84	T-Storm
1/5/2013	0		1/30/2013	0.35		2/23/2013	0.34	
1/6/2013	0.21		1/31/2013	0.04		2/24/2013	0	
1/7/2013	0.53		**February**			2/25/2013	0.25	
1/8/2013	0.26		2/1/2013	0		2/26/2013	0	
1/9/2013	0.52		2/2/2013	0		2/27/2013	0.01	
1/10/2013	0.04		2/3/2013	0		2/28/2013	0.07	
1/11/2013	0		2/4/2013	0		**March**		
1/12/2013	0		2/5/2013	0.07		3/1/2013	0	
1/13/2013	0		2/6/2013	0.1		3/2/2013	0.04	
1/14/2013	0.01		2/7/2013	0		3/3/2013	0.05	
1/15/2013	0		2/8/2013	0		3/4/2013	0	
1/16/2013	0		2/9/2013	0		3/5/2013	0.07	
1/17/2013	0		2/10/2013	0		3/6/2013	0.34	
1/18/2013	0		2/11/2013	0.02		3/7/2013	0	
1/19/2013	0		2/12/2013	0.03		3/8/2013	0	
1/20/2013	0		2/13/2013	0.01		3/9/2013	0	
1/21/2013	0		2/14/2013	0		3/10/2013	0.02	
1/22/2013	0		2/15/2013	0		3/11/2013	0	
1/23/2013	0.06		2/16/2013	0.01		3/12/2013	0	
1/24/2013	0.2		2/17/2013	0		3/13/2013	0	
1/25/2013	0		2/18/2013	0.09		3/14/2013	0	
1/26/2013	0.13		2/19/2013	0.03		3/15/2013	0.11	

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
3/16/2013	0.23		4/9/2013	0		5/3/2013	0	
3/17/2013	0.27		4/10/2013	0.11		5/4/2013	0	
3/18/2013	0.03		4/11/2013	0.07		5/5/2013	0	
3/19/2013	0.4		4/12/2013	0.2		5/6/2013	0	
3/20/2013	0.7		4/13/2013	0.43		5/7/2013	0	
3/21/2013	0.26		4/14/2013	0.24		5/8/2013	0	
3/22/2013	0.06		4/15/2013	0.21		5/9/2013	0	
3/23/2013	0.01		4/16/2013	0		5/10/2013	0	
3/24/2013	0		4/17/2013	0		5/11/2013	0	
3/25/2013	0		4/18/2013	0.04		5/12/2013	0.01	
3/26/2013	0		4/19/2013	0.4		5/13/2013	0.03	
3/27/2013	0.11		4/20/2013	0		5/14/2013	0.03	
3/28/2013	0.14		4/21/2013	0.01		5/15/2013	0.01	
3/29/2013	0		4/22/2013	0		5/16/2013	0.37	
3/30/2013	0		4/23/2013	0		5/17/2013	0.08	
3/31/2013	0		4/24/2013	0		5/18/2013	0.04	
April			4/25/2013	0		5/19/2013	0.07	
4/1/2013	0		4/26/2013	0		5/20/2013	0	T-Storm
4/2/2013	0		4/27/2013	0.01		5/21/2013	0.35	
4/3/2013	0		4/28/2013	0.03		5/22/2013	0.91	
4/4/2013	0.34		4/29/2013	0.1		5/23/2013	1.04	
4/5/2013	0.4		4/30/2013	0		5/24/2013	0.37	
4/6/2013	0.41		**May**			5/25/2013	0.08	
4/7/2013	0.46		5/1/2013	0		5/26/2013	0.27	
4/8/2013	0	T-Storm	5/2/2013	0		5/27/2013	0.38	

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
5/28/2013	0.36		6/26/2013	0		7/20/2013	0	
5/29/2013	0.74		6/27/2013	0.03		7/21/2013	0	
5/30/2013	0.26		6/28/2013	0		7/22/2013	0	
5/31/2013	0.11		6/29/2013	0		7/23/2013	0	
June			6/30/2013	0		7/24/2013	0	
6/1/2013	0		**July**			7/25/2013	0	
6/2/2013	0		7/1/2013	0		7/26/2013	0	
6/3/2013	0		7/2/2013	0		7/27/2013	0	
6/4/2013	0		7/3/2013	0		7/28/2013	0	
6/5/2013	0		7/4/2013	0		7/29/2013	0	
6/6/2013	0		7/5/2013	0		7/30/2013	0	
6/7/2013	0		7/6/2013	0		7/31/2013	0	
6/8/2013	0		7/7/2013	0		**August**		
6/9/2013	0		7/8/2013	0		8/1/2013	0	
6/10/2013	0		7/9/2013	0		8/2/2013	0	
6/11/2013	0.28		7/10/2013	0		8/3/2013	0	
6/17/2013	0.04		7/11/2013	0		8/4/2013	0	
6/18/2013	0.08		7/12/2013	0		8/5/2013	0	
6/19/2013	0.02		7/13/2013	0		8/6/2013	0	
6/20/2013	0		7/14/2013	0		8/7/2013	0	
6/21/2013	0.01		7/15/2013	0		8/8/2013	0	
6/22/2013	0		7/16/2013	0		8/9/2013	0	
6/23/2013	0.32		7/17/2013	0		8/10/2013	0	
6/24/2013	0.22		7/18/2013	0.04		8/11/2013	0	
6/25/2013	0.04		7/19/2013	0		8/12/2013	0	

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
8/13/2013	0		9/6/2013	1.71		**October**		
8/14/2013	0		9/7/2013	0.02		10/1/2013	0.37	
8/15/2013	0.04		9/8/2013	0		10/2/2013	0.3	
8/16/2013	0		9/9/2013	0		10/3/2013	0.01	
8/17/2013	0		9/10/2013	0		10/4/2013	0	
8/18/2013	0		9/11/2013	0		10/5/2013	0	
8/19/2013	0		9/12/2013	0		10/6/2013	0	
8/20/2013	0		9/13/2013	0		10/7/2013	0.24	
8/21/2013	0		9/14/2013	0		10/8/2013	0.19	
8/22/2013	0		9/15/2013	0.1		10/9/2013	0	
8/23/2013	0		9/16/2013	0.12		10/10/2013	0.03	
8/24/2013	0		9/17/2013	0.05		10/11/2013	0	
8/25/2013	0.01		9/18/2013	0.02		10/12/2013	0.08	
8/26/2013	0.08		9/19/2013	0		10/13/2013	0	
8/27/2013	0.06		9/20/2013	0.03		10/14/2013	0	
8/28/2013	0.04		9/21/2013	0.04		10/15/2013	0	
8/29/2013	0.13		9/22/2013	0.78		10/16/2013	0	
8/30/2013	0.01		9/23/2013	0.35		10/17/2013	0	
8/31/2013	0		9/24/2013	0.36		10/18/2013	0	
September			9/25/2013	0.02		10/19/2013	0	
9/1/2013	0		9/26/2013	0		10/20/2013	0	
9/2/2013	0		9/27/2013	0.4		10/21/2013	0	
9/3/2013	0.24		9/28/2013	1.71		10/22/2013	0	
9/4/2013	0.02		9/29/2013	1.14		10/23/2013	0	
9/5/2013	0.66		9/30/2013	0.4		10/24/2013	0	

Date	Precipitation (inches)	Event
10/25/2013	0	
10/26/2013	0	
10/27/2013	0.25	
10/28/2013	0	
10/29/2013	0	
10/30/2013	0	
10/31/2013	0.02	
November		
11/1/2013	0.14	
11/2/2013	0.68	
11/3/2013	0.11	
11/4/2013	0.11	
11/5/2013	0.06	
11/6/2013	0.18	
11/7/2013	0.71	
11/8/2013	0.07	
11/9/2013	0	
11/10/2013	0	
11/11/2013	0	
11/12/2013	0.08	
11/13/2013	0	
11/14/2013	0.04	
11/15/2013	0.46	
11/16/2013	0.34	
11/17/2013	0.11	
11/18/2013	0.23	
11/19/2013	0.27	
11/20/2013	0	
11/21/2013	0	
11/22/2013	0	
11/23/2013	0	
11/24/2013	0	
11/25/2013	0	
11/26/2013	0	
11/27/2013	0	
11/28/2013	0	
11/29/2013	0	
11/30/2013	0.16	
December		
12/1/2013	1.68	
12/2/2013	0.24	
12/3/2013	0	
12/4/2013	0	
12/5/2013	0	
12/6/2013	0	
12/7/2013	0	
12/8/2013	0	
12/9/2013	0	
12/10/2013	0.02	
12/11/2013	0	
12/12/2013	0.09	
12/13/2013	0.02	
12/14/2013	0	
12/15/2013	0.01	
12/16/2013	0	
12/17/2013	0	
12/18/2013	0.06	
12/19/2013	0	
12/20/2013	0.33	
12/21/2013	0.07	
12/22/2013	0	
12/23/2013	0.17	
12/24/2013	0	
12/25/2013	0	
12/26/2013	0	
12/27/2013	0	
12/28/2013	0	
12/29/2013	0	
12/30/2013	0	
12/31/2013	0	
2014 Precipitation Data		
January		
1/1/2014	0	
1/2/2014	0.15	

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
1/3/2014	0		1/28/2014	0.42		2/21/2014	0.04	
1/4/2014	0		1/29/2014	0.27		2/22/2014	0	
1/5/2014	0		1/30/2014	0.16		2/23/2014	0	
1/6/2014	0.01		1/31/2014	0.13		2/24/2014	0.13	
1/7/2014	0.22		**February**			2/25/2014	0	
1/8/2014	0.45		2/1/2014	0.06		2/26/2014	0	
1/9/2014	0.13		2/2/2014	0.02		2/27/2014	0	
1/10/2014	0.06		2/3/2014	0		2/28/2014	0	
1/11/2014	0.76		2/4/2014	0		**March**		
1/12/2014	0.88		2/5/2014	0		3/1/2014	0	
1/13/2014	0.01		2/6/2014	0		3/2/2014	0.18	
1/14/2014	0		2/7/2014	0.08		3/3/2014	0.3	
1/15/2014	0	T-Storm	2/8/2014	0.24		3/4/2014	0	
1/16/2014	0		2/9/2014	0.44		3/5/2014	1.5	
1/17/2014	0		2/10/2014	0.45		3/6/2014	0.99	
1/18/2014	0		2/11/2014	0.39		3/7/2014	0	
1/19/2014	0		2/12/2014	0.07		3/8/2014	0.73	
1/20/2014	0		2/13/2014	0.11		3/9/2014	0.29	
1/21/2014	0		2/14/2014	0.45		3/10/2014	0.39	
1/22/2014	0		2/15/2014	0.75		3/11/2014	0	
1/23/2014	0		2/16/2014	0.14		3/12/2014	0	
1/24/2014	0		2/17/2014	1.46		3/13/2014	0.03	
1/25/2014	0		2/18/2014	1.06		3/14/2014	0.24	
1/26/2014	0		2/19/2014	0.33		3/15/2014	0.02	
1/27/2014	0		2/20/2014	0.32		3/16/2014	1.09	

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
3/17/2014	0		4/10/2014	0		5/4/2014	0.32	
3/18/2014	0		4/11/2014	0		5/5/2014	0.04	
3/19/2014	0.11		4/12/2014	0		5/6/2014	0	
3/20/2014	0.03		4/13/2014	0		5/7/2014	0	
3/21/2014	0		4/14/2014	0		5/8/2014	0.3	
3/22/2014	0		4/15/2014	0	T-Storm	5/9/2014	0.33	
3/23/2014	0		4/16/2014	0.06		5/10/2014	0.03	
3/24/2014	0		4/17/2014	0.8		5/11/2014	0.01	
3/25/2014	0.14		4/18/2014	0.02		5/12/2014	0	
3/26/2014	0.49		4/19/2014	0.32		5/13/2014	0	
3/27/2014	0.08		4/20/2014	0		5/14/2014	0	
3/28/2014	0.45		4/21/2014	0.29		5/15/2014	0	
3/29/2014	0.54		4/22/2014	0.33		5/16/2014	0	
3/30/2014	0.33		4/23/2014	0.78		5/17/2014	0	
3/31/2014	0.02		4/24/2014	0.43		5/18/2014	1.23	
April			4/25/2014	0		5/19/2014	0.13	
4/1/2014	0.35		4/26/2014	0.23	T-Storm	5/20/2014	0	
4/2/2014	0		4/27/2014	0.23		5/21/2014	0	
4/3/2014	0	T-Storm	4/28/2014	0		5/22/2014	0	
4/4/2014	0.14	T-Storm	4/29/2014	0		5/23/2014	0.19	
4/5/2014	0.14	T-Storm	4/30/2014	0		5/24/2014	0	
4/6/2014	0		**May**			5/25/2014	0.32	
4/7/2014	0		5/1/2014	0		5/26/2014	0.02	
4/8/2014	0.04		5/2/2014	0		5/27/2014	0	
4/9/2014	0.04		5/3/2014	0.21		5/28/2014	0.01	

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
5/29/2014	0.02		6/22/2014	0		7/16/2014	0	
5/30/2014	0		6/23/2014	0		7/17/2014	0	
5/31/2014	0		6/24/2014	0		7/18/2014	0	
June			6/25/2014	0.07		7/19/2014	0	
6/1/2014	0		6/26/2014	0.38		7/20/2014	0	
6/2/2014	0		6/27/2014	0.38		7/21/2014	0	
6/3/2014	0		6/28/2014	0.18		7/22/2014	0	
6/4/2014	0		6/29/2014	0.01		7/23/2014	0.51	
6/5/2014	0		6/30/2014	0		7/24/2014	0.08	
6/6/2014	0		**July**			7/25/2014	0	
6/7/2014	0		7/1/2014	0		7/26/2014	0	
6/8/2014	0		7/2/2014	0		7/27/2014	0	
6/9/2014	0		7/3/2014	0		7/28/2014	0	
6/10/2014	0		7/4/2014	0		7/29/2014	0	
6/11/2014	0		7/5/2014	0		7/30/2014	0	
6/12/2014	0.77		7/6/2014	0		7/31/2014	0	
6/13/2014	0.07		7/7/2014	0		**August**		
6/14/2014	0		7/8/2014	0		8/1/2014	0	T-storm
6/15/2014	0.07		7/9/2014	0		8/2/2014	0	
6/16/2014	0.1		7/10/2014	0		8/3/2014	0	
6/17/2014	0		7/11/2014	0		8/4/2014	0	
6/18/2014	0		7/12/2014	0		8/5/2014	0	
6/19/2014	0.01		7/13/2014	0		8/6/2014	0	
6/20/2014	0		7/14/2014	0		8/7/2014	0	
6/21/2014	0		7/15/2014	0		8/8/2014	0	

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
8/9/2014	0		9/2/2014	0		9/27/2014	0.13	
8/10/2014	0		9/3/2014	0		9/28/2014	0	
8/11/2014	0		9/4/2014	0		9/29/2014	0.06	
8/12/2014	0.41	T-storm	9/5/2014	0		9/30/2014	0.06	
8/13/2014	0.07		9/6/2014	0		**October**		
8/14/2014	0		9/7/2014	0		10/1/2014	0.05	
8/15/2014	0		9/8/2014	0		10/2/2014	0	
8/16/2014	0		9/9/2014	0		10/3/2014	0	
8/17/2014	0		9/10/2014	0		10/4/2014	0	
8/18/2014	0		9/11/2014	0		10/5/2014	0	
8/19/2014	0		9/12/2014	0		10/6/2014	0	
8/20/2014	0		9/13/2014	0		10/7/2014	0	
8/21/2014	0		9/14/2014	0		10/8/2014	0	
8/22/2014	0		9/15/2014	0		10/9/2014	0	
8/23/2014	0		9/16/2014	0		10/10/2014	0	
8/24/2014	0		9/17/2014	0.01		10/11/2014	0.16	
8/25/2014	0		9/18/2014	0.01		10/12/2014	0	
8/26/2014	0		9/19/2014	0		10/13/2014	0.14	
8/27/2014	0		9/20/2014	0.05		10/14/2014	0.38	
8/28/2014	0		9/21/2014	0.05		10/15/2014	0.46	
8/29/2014	0		9/22/2014	0.02		10/16/2014	0.02	
8/30/2014	0.18		9/23/2014	0.44		10/17/2014	0.22	
8/31/2014	0		9/24/2014	0.65		10/18/2014	0	
September			9/25/2014	0.09		10/19/2014	0	
9/1/2014	0		9/26/2014	0.59		10/20/2014	0.09	

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
10/21/2014	0.04		11/14/2014	0		12/8/2014	0	
10/22/2014	0.94		11/15/2014	0		12/9/2014	0.45	
10/23/2014	0.29		11/16/2014	0		12/10/2014	0.75	
10/24/2014	0.22		11/17/2014	0		12/11/2014	0.33	
10/25/2014	0.37		11/18/2014	0		12/12/2014	0.01	
10/26/2014	0.52		11/19/2014	0.01		12/13/2014	0	
10/27/2014	0.05		11/20/2014	0.02		12/14/2014	0	
10/28/2014	0.19		11/21/2014	0.62		12/15/2014	0	
10/29/2014	0.02		11/22/2014	0.31		12/16/2014	0	
10/30/2014	0.84		11/23/2014	0.36	T-storm	12/17/2014	0.09	
10/31/2014	1.08		11/24/2014	0.16		12/18/2014	0.34	
November			11/25/2014	0.55		12/19/2014	0.08	
11/1/2014	0		11/26/2014	0		12/20/2014	1.55	
11/2/2014	0.2		11/27/2014	0.21		12/21/2014	0.23	
11/3/2014	0.44		11/28/2014	0.87		12/22/2014	0.01	
11/4/2014	0.29		11/29/2014	0.27		12/23/2014	0.19	
11/5/2014	0.02		11/30/2014	0		12/24/2014	0.39	
11/6/2014	0.19		**December**			12/25/2014	0	
11/7/2014	0		12/1/2014	0		12/26/2014	0	
11/8/2014	0		12/2/2014	0		12/27/2014	0.64	
11/9/2014	0.24		12/3/2014	0		12/28/2014	0.14	
11/10/2014	0		12/4/2014	0.11		12/29/2014	0.05	
11/11/2014	0		12/5/2014	0.08		12/30/2014	0	
11/12/2014	0		12/6/2014	0.29		12/31/2014	0	
11/13/2014	0		12/7/2014	0		**January**		

Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event	Date	Precipitation (inches)	Event
1/1/2015	0		1/26/2015	0				
1/2/2015	0		1/27/2015	0				
1/3/2015	0		1/28/2015	0				
1/4/2015	1.78		1/29/2015	0				
1/5/2015	0.81		1/30/2015	0				
1/6/2015	0		1/31/2015	0				
1/7/2015	0		**February**					
1/8/2015	0		2/1/2015	0.16				
1/9/2015	0		2/2/2015	0.19				
1/10/2015	0.04		2/3/2015	0.03				
1/11/2015	0		2/4/2015	0.11				
1/12/2015	0		2/5/2015	0.5				
1/13/2015	0		2/6/2015	0.65				
1/14/2015	0		2/7/2015	1.36				
1/15/2015	0.48		2/8/2015	0.22				
1/16/2015	0.02		2/9/2015	0.13				
1/17/2015	1.33							
1/18/2015	0.42							
1/19/2015	0.18							
1/20/2015	0							
1/21/2015	0							
1/22/2015	0							
1/23/2015	0.14							
1/24/2015	0.03							
1/25/2015	0							

CERTIFICATE OF SERVICE

I, Jessie Sherwood, certify under penalty of perjury of the laws of the State of Washington that on April 29, 2015, I served copies of the foregoing Complaint via United States Mail, postage prepaid with return receipt requested, upon the following:

Attorney General Loretta Lynch
U.S. Department of Justice
950 Pennsylvania Ave. NW
Washington, DC 20530

Attorney General - Citizen Suit Coordinator
Environmental and Natural Resources Division
Law & Policy Section
PO Box 7415
Ben Franklin Station
Washington, DC 20044-7415

Gina McCarthy
Administrator, U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N.W.
Mail Code 1101A
Washington, DC 20460

Dennis J. McLerran
Regional Administrator
U.S. Environmental Protection Agency, Region 10
1200 Sixth Ave., Suite 900
Seattle, WA 98101

This certificate is being prepared and maintained according to standard protocol for this office.

Jessie Sherwood — 4/29/2015
Jessie Sherwood — Date

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